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15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

19 CLINTON REILLY,  
20 Plaintiff,  
21 v.  
22 MEDIANEWS GROUP, INC.; THE  
23 HEARST CORPORATION; STEPHENS  
24 GROUP INC.; GANNETT CO., INC.; and  
25 CALIFORNIA NEWSPAPERS  
PARTNERSHIP,  
Defendants.

Case No. 06-CV-04332-SI

[Complaint Filed: July 14, 2006]

STIPULATION AND [PROPOSED]  
FURTHER CASE MANAGEMENT  
ORDER

Judge: Hon. Susan Illston

Trial Date: February 26, 2007

1           WHEREAS the parties previously stipulated to a case management schedule  
 2 providing for, *inter alia*, a deadline of September 29, 2006 for all parties to respond to  
 3 non-expert written discovery, a deadline of October 31, 2006 for all parties to complete  
 4 non-expert depositions, and a trial date of February 26, 2007;

5           WHEREAS the Court adopted the parties' proposed case management  
 6 schedule in its August 23, 2006 Case Management Order and September 19, 2006 Pretrial  
 7 Preparation Order;

8           WHEREAS, after the parties entered into the previous scheduling stipulation  
 9 and the Court entered its Case Management Order, the Department of Justice issued  
 10 extensive Requests for Additional Information and Documentary Evidence ("Second  
 11 Requests") to Defendants MediaNews Group, Inc. and The Hearst Corporation regarding  
 12 Hearst's proposed equity investment in MediaNews Group's non-Bay Area properties;

13           WHEREAS MediaNews Group and Hearst currently are negotiating the  
 14 details of the production of a large volume of documents pursuant to the Second Requests,  
 15 and the parties believe in light of such productions that it would be inefficient and  
 16 impractical to proceed with this action under the current discovery and trial timetable, such  
 17 that a modification of the current case management schedule is appropriate;

18           WHEREAS the parties have met and conferred and, in light of the  
 19 Department of Justice's investigation, agreed to the revised case management schedule set  
 20 forth below, subject to the Court's approval and availability;

21           NOW THEREFORE, pursuant to Northern District Civil Local Rules 6-2(a)  
 22 and 16-2(e), the parties hereby stipulate and agree to the following case management  
 23 schedule:

24           1. This schedule concerns only (a) the acquisitions of the McClatchy  
 25 newspapers that were the subject of the Court's Order Denying Plaintiff's  
 26 Application for Temporary Restraining Order; and (b) Hearst's proposed  
 27 equity investment in MediaNews Group's non-Bay Area properties.

1           2. This schedule does not concern any potential future broadening of Hearst's  
2           proposed equity investment in MediaNews Group pursuant to equity  
3           conversion provisions or otherwise: Hearst and MediaNews Group expect  
4           that any such transaction, if it were to occur, would be the subject of future  
5           antitrust Hart-Scott-Rodino Act regulatory filings. If such a transaction  
6           occurs, and plaintiff elects to challenge it, the parties would propose an  
7           appropriate schedule at that time.

8           3. The deadline for all parties to produce documents in response to non-expert  
9           written discovery shall be November 30, 2006.

10          4. The deadline for all parties to complete non-expert depositions shall be  
11          December 22, 2006.

12          5. The deadline for Plaintiff to file his expert report(s) shall be  
13          January 8, 2007.

14          6. The deadline for Defendants to file their expert reports shall be  
15          January 16, 2007.

16          7. The Court will hold a Further Case Management Conference on January 19,  
17          2007 at 2:30 p. .m. Counsel must file a joint case management statement  
18          seven days in advance of the conference.

19          8. The deadline for all parties to complete expert depositions shall be  
20          February 2, 2007.

21          9. The deadline for all parties to file and serve dispositive pre-trial motions  
22          shall be February 9, 2007.

23          10. The deadline for all parties to file and serve any opposition to a dispositive  
24           pre-trial motion shall be March 9, 2007.

25          11. The deadline for all parties to file and serve any reply in support of a  
26           dispositive pre-trial motion shall be March 16, 2007.

27          12. The deadline for all parties to exchange trial exhibits shall be  
28           March 23, 2007.

## 8 | IT IS SO STIPULATED.

9 | Dated: October 6, 2006

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By \_\_\_\_\_ /S/  
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17 Dated: October 6, 2006

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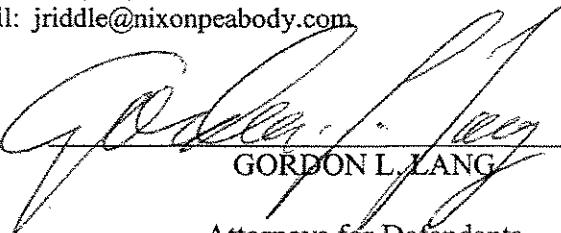
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1 Dated: October \_\_\_, 2006

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15

16 **ORDER**

17 Pursuant to the foregoing stipulation of the parties, the declaration of  
18 counsel, and for good cause shown, the foregoing case management schedule is hereby  
19 adopted by the Court. The August 23, 2006 Case Management Order and September 19,  
20 2006 Pretrial Preparation Order are VACATED.

21

22 IT IS SO ORDERED.

23

24 October \_\_\_, 2006

*Susan Illston*

25 HON. SUSAN ILLSTON  
26 UNITED STATES DISTRICT COURT JUDGE